

REMARKS / ARGUMENTS

1. Response to January 14, 2008 Office Action

The Office Action initially rejects pending claims 1-23 over a primary reference to *Mahany* (US 5,657,317) under 35 U.S.C. 102(b), or under 35 U.S.C. 103(a) over the primary reference to *Mahany* in combination with either *Hassett* (US 5,347,274) or *Tsukamoto* (US 2003/0014334). For the reasons explained herein, the Assignee respectfully traverses the rejections.

For the convenience of the Examiner and clarity of purpose, Assignee has reprinted portions of the substance of the Office Action below. Assignee's arguments immediately follow in regular font. The independent claims are claims 1 and 12. The Office Action states:

2. **Claims 1, 5-15, 19-23** are rejected under 35 U.S.C. 102(b) as being anticipated by **Mahany et al. (US 5,657,317)** (hereinafter "**Mahany**").

3. **With respect to claim 1:** Mahany discloses:

a. a waste management electronic base system having a memory, processor, an input element, and an output element, the base system adapted to process waste management data for tracking a location of a waste storage unit, billing a customer associated with a waste removal, and paying personnel for services associated with the waste removal; (col. 46, lines 38-50 -- upon reaching destination and at delivery site dock the goods are scanned for delivery verification and as this occurs as this occurs can be generated; Fig. 31; col. 11, line 50-col. 12, line 14; col. 28, lines 14-36; col. 29, lines 55-59; col. 46, lines 38-50 -- system consists of scanner, portable key board as well as wireless system; col. 62, lines 4-18 and 45-59 - terminal in the truck automatically relays "preliminary invoice" to the base station; upon delivery, verified invoice is automatically routed to inventory computer) and

11. **With respect to claim 12:** Mahany discloses: a. using a waste management electronic base system having a memory, processor, an input element, and an output element, to process waste management data, comprising:

- i. tracking a location of a waste storage unit;
- ii. billing a customer associated with a waste removal; and
- iii. paying personnel for services associated with the waste removal;

(col. 46, lines 38-50 – upon reaching destination and at delivery site dock the goods are scanned for delivery verification and as this occurs as this occurs can be generated; Fig. 31; col. 11, line 50-col. 12, line 14; col. 28, lines 14-36; col. 29, lines 55-59; col. 46, lines 38-50 – system consists of scanner, portable key board as well as wireless system; col. 62, lines 4-18 and 45-59 - terminal in the truck automatically relays "preliminary invoice" to the base station; upon delivery, verified invoice is automatically routed to inventory computer) and

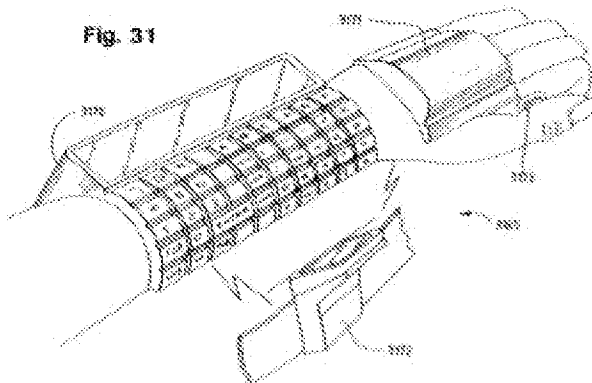
Assignee respectfully traverses the rejection of the independent claims 1 and 12 and associated dependent claims. Assignee does not accede to the Office Action's characterization of *Mahany* as applied to the claims, and Assignee respectfully reserves its right to disagree with that characterization in the future. For a prior art reference to anticipate in terms of 35 U.S.C. § 102(b), each and every element as set forth in the claims must be found, either expressly or inherently described, in a single prior art reference. *In re Schreiber*, 128 F.3d 1473, 1477 (Fed. Cir. 1997); *see also Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987); MPEP § 2131. Further, according to the single source rule, all of the claim's limitations must be contained in a single reference, *see, e.g., Brown v. 3M*, 265 F.3d 1349, 1351 (Fed. Cir. 2001).

Each passage of *Mahany* cited in the above statement in the Office Action is repeated for reference below:

Col. 46, lines 38-50:

Upon reaching the destination, the storage terminal 3031
may participate in any in range peripheral and premises
40 LAN at the delivery site dock. Specifically, as specific goods
are unloaded, they are scanned for delivery verification,
preventing delivery of unwanted goods. The driver is also
informed if goods that should have been delivered are still
in the truck. As this process takes place, a report can also be
45 generated via a peripheral or premises LAN printer at the
destination dock for receipt signature. Similarly, the periph-
eral LAN modem on the destination dock can relay the
delivery information back to the host computer 3011 for
billing information or gather additional information needed.
50 avoiding use of the radio WAN.

Fig. 31:



Col. 11, line 50-col. 12, line 14:

Two peripheral LANs 40 and 41 allow for wireless communication between each mobile computing device 35 and 36 and its respective peripheral devices 43, 44 and 45 when the mobile computing device is not communicating on the premises LAN 37. Specifically, the peripheral LAN 40 consists of the mobile computing device 35 and the peripheral device 43, while the peripheral LAN 41 consists of the mobile computing device 36 and the two peripheral devices 44 and 45.

FIG. 1C illustrates another embodiment according to the present invention of a larger hierarchal communication system 50. The host computer 55 is connected to base stations 56, 57, 58 and 59. The host computer 55 and the base stations 56, 57, 58 and 59 provide the infrastructure for the premises LAN. The base stations need not be hard-wired together. For example, as illustrated in FIG. 1C, the base stations 56, 57 and 58 access each other and the host computer 55 via a hard-wired link, while the base station 59 accomplishes such access via a wireless link with the base station 58.

The base stations 56, 58 and 59 can support multiple mobile computing devices. For example, the base station 56 uses a frequency-hopping communication protocol for maintaining communication with mobile computing devices 61 and 62. Moreover, each of the mobile computing devices may roam out of range of the base station with which they have been communicating and into the range of a base station with which they will at least temporarily communicate. Together, the host computer 55 and the base stations 56, 57, 58 and 59 and mobile computing devices 61, 62, 64, 65 and 66 constitute a premises LAN.

Col. 28, lines 14-36:

Wireless base stations operate as slave devices to master
base stations which are connected to the wired infrastruc-
15 ture. The wired and wireless base stations share the same
hopping sequence, and are synchronized as a common NET.
Because they are not connected to the Infrastructure, wire-
less base stations must be used as store and forward devices.
Each transmission to a wireless base must be retransmitted
20 to the intended destination device, doubling the number of
transmissions occurring in the NET. Wireless base stations
are preferably used for supplementing coverage area of the
premises LAN. For example, a wireless base station might
provide spot coverage of isolated "dead spots" where data
25 traffic is limited or where providing a wired LAN connection
is difficult. Wireless base stations may also serve as emer-
gency spares to provide coverage in the event of a failure of
a primary base station. In this role, the wireless base station
may be either permanently installed in selected locations, or
30 stored in a maintenance area and quickly positioned and
connected to AC or battery power to provide communica-
tions while repairs are made to the primary wired base
station. Moreover, permanently installed wireless base sta-
tions might also be used for redundancy, i.e., to monitor an
associated base station and to take over when a break-down
35 is detected.

Col. 29, lines 55-59:

1411. A portable/mobile device 1413 is initially registered 55
with base station 1401, which acts as a control point for the
portable/mobile device 1413. HELLO messages transmitted
by base station 1401 to portable/mobile device 1413 contain
fields for neighboring base stations 1403, 1405 and 1409.
These fields may indicate, for example, addresses of the 60
neighboring bases, their COST, the hopping sequences,
hopping sequence indices, number of Access Intervals per
hop, and NET clock. The portable/mobile device 1413
detects the HELLOs transmitted from base station 1401 and
uses the information for coarse synchronization with the 65
other base stations 1403, 1405 and 1409. This permits the
portable/mobile device to roam between base station cov-

Col. 46, lines 38-50 is shown above.

Col. 62, lines 4-18 and 45-59:

At the remote warehouse 4519, the delivery truck 4513 is
5 loaded pursuant to the inventory request received from the
inventory computer 4511. After loading, the truck 4513
travels to the premises of the retail store. When within range
of the base station 4517, the radio terminal 4515 in the truck
4513 automatically gains access to the retail premises LAN
10 via the base station 4517 (as detailed above), and commu-
nicates an anticipated delivery list (a "preliminary invoice"),
responsive to the inventory request, to the inventory com-
puter 4511. In response, dock workers can be notified to
prepare for the arrival of the delivery truck 4513. In addition,
15 any rerouting information can be communicated to the
terminal 4515 in the delivery truck 4513. If a complete
rerouting is indicated, the truck 4513 may be redirected
without ever having reached the dock.

45 Upon confirmation of the delivery by the dock worker, a
verified invoice is automatically generated by the radio
terminal 4515 and routed to the inventory computer 4511 for
inventory and billing purposes. In addition, the verified
invoice is routed to the warehouse 4519. Such routing may
50 occur as soon as the delivery truck returns to the warehouse
4519. However, to accommodate rerouting in situations
where goods have been turned away at the retail store, the
radio terminal 4515 communicates the final invoice imme-
diately to the warehouse 4519. The warehouse 4519, upon
55 receiving the final invoice, checks the final invoice with the
list of goods loaded in the delivery truck 4513, and deter-
mines whether delivery of the remaining goods is possible.
If so, the warehouse 4519 reroutes the truck 4513 to the next
delivery site.

These referenced passages in *Mahany* are cited by the Office Action to show that *Mahany* discloses a waste management electronic base system, adapted to process waste management data of a waste storage unit, billing a customer associated with a waste removal, and paying personnel for services associated with the waste removal.

However, upon reviewing each referenced portion cited in the Office Action, *Mahany* utterly fails to teach a waste management system as required in claim 1 or using a waste management electronic base system as required in claim 12 for tracking a location of a waste storage unit, paying personnel for services associate with the waste removal, and so forth. Even a word search through *Mahany* reveals the limited and totally different use of “waste” or a derivative thereof in three instances shown below where “waste” is italicized, all unrelated to waste removal:

Col. 1, lines 5-9: “Multiple radio base station networks have been developed to overcome a variety of problems with single radio base station networks such as spanning physical radio wave penetration barriers, *wasted* transmission power by portable computing devices, etc.”

Col. 3, line 60- col. 4, line 15: “Another solution has been to set up Local Area Networks (LAN's) utilizing various forms of RF (Radio Frequency) communication. . . . Similarly, in such systems, the computer terminals are also required to remain active to receive an occasional communication not only from the other terminals or the host, but also from the peripherals. Again, often unnecessarily, battery power is *wasted*.”

Col. 32, lines 34-39: “Once the unit attaches to a base, the message must be transferred from the previous base station for delivery to the unit. All of these activities require transmission bandwidth on either the backbone or RF media, *waste* processing resources within the premise LAN, and result in delayed delivery.”

None of these uses of the word “wasted” or “waste” are remotely related to the waste removal system of the present invention. *Mahany* uses “wasted” or “waste” for meaning *inefficient operation*, not waste removal services. Further, the undersigned found no referenced portion that discloses paying personnel for services associated with the waste removal, as

required by claims 1 and 12. The only “pay” in *Mahany* is “payload.”

The *Mahany* reference appears to be cited on the basis of prohibited hindsight in trying to fit the “square peg in a round hole.” Applying *Mahany* is contrary to the admonition in the recent Supreme Court case of *KSR Int’l v. Teleflex Inc.*, 127 S.Ct. 1727, 1742 (2007), where it states: “A factfinder should be aware, of course, of the distortion caused by hindsight bias and must be cautious of arguments reliant upon *ex post* reasoning. See *Graham*, 383 U.S., at 36, 86 S.Ct. 684 (warning against a “temptation to read into the prior art the teachings of the invention in issue” and instructing courts to “ ‘guard against slipping into the use of hindsight’ ” (quoting *Monroe Auto Equipment Co. v. Heckethorn Mfg. & Supply Co.*, 332 F.2d 406, 412 (C.A.6 1964))).”

The Office Action further cites *Mahany* against dependent claims of independent claims 1 and 12. It is believed that a detailed discussion of each dependent claim is not needed in light of the lack of teaching of *Mahany* against a waste removal system, as claimed in claims 1 and 12. However, for further comment, the Office Action rejects claims 10, 14, and 23 as follows:

9. **With respect to claims 10, 14 and 23:** Mahany discloses the portable unit is adapted to require predetermined operator input for a first operation to release the operator to perform a next operation. (col. 62, lines 4-18 and 45-59 - terminal in the truck automatically relays “preliminary invoice” to the base station; upon delivery, verified invoice is automatically routed to inventory computer).

Assignee respectfully traverses this characterization as well. The cited passage, Col. 62, lines 4-18 and 45-59 is referenced below:

At the remote warehouse 4519, the delivery truck 4513 is
5 loaded pursuant to the inventory request received from the
inventory computer 4511. After loading, the truck 4513
travels to the premises of the retail store. When within range
of the base station 4517, the radio terminal 4515 in the truck
4513 automatically gains access to the retail premises LAN
10 via the base station 4517 (as detailed above), and commu-
nicates an anticipated delivery list (a "preliminary invoice"),
responsive to the inventory request, to the inventory com-
puter 4511. In response, dock workers can be notified to
prepare for the arrival of the delivery truck 4513. In addition,
15 any rerouting information can be communicated to the
terminal 4515 in the delivery truck 4513. If a complete
rerouting is indicated, the truck 4513 may be redirected
without ever having reached the dock.

45 Upon confirmation of the delivery by the dock worker, a
verified invoice is automatically generated by the radio
terminal 4515 and routed to the inventory computer 4511 for
inventory and billing purposes. In addition, the verified
invoice is routed to the warehouse 4519. Such routing may
50 occur as soon as the delivery truck returns to the warehouse
4519. However, to accommodate rerouting in situations
where goods have been turned away at the retail store, the
radio terminal 4515 communicates the final invoice imme-
diately to the warehouse 4519. The warehouse 4519, upon
55 receiving the final invoice, checks the final invoice with the
list of goods loaded in the delivery truck 4513, and deter-
mines whether delivery of the remaining goods is possible.
If so, the warehouse 4519 reroutes the truck 4513 to the next
delivery site.

There is nothing in the cited passage that requires predetermined operator input as claimed in dependent claims 10, 14, and 23. Quite the opposite, the system automatically performs its operations without operator input.

The section 102 rejection cannot stand according to case law or MPEP. The Examiner is respectfully requested to withdraw this rejection.

15. **Claims 2 and 16** are rejected under 35 U.S.C. 103(a) as being unpatentable over **Mahany** in view of **Hassett (US 5,347,274)**.

16. **With respect to claims 2 and 16:** Mahany teaches the limitations in the rejections above. However, Mahany does not teach a waste removal vehicle and a waste storage unit selectively coupled with the waste removal vehicle. Hassett teaches a waste removal vehicle and a waste storage unit selectively coupled with the waste removal vehicle. (col. 3, lines 52-62 – “the invention contemplates embodiments adapted to all modes of transport... the term “vehicle” as used in the disclosure and the patent claims herein is to include boat, airplane, truck, rail car or engine, and all other forms of transport vehicle, as well as such tanks, containers or vessels as may demountably attach to or be carried by a transport vehicle”).

Therefore, it would have been obvious to one of ordinary skill in the art at the time of the invention to combine to portable wireless system of Mahany with the waste removal and storage unit in Hassett because of the need to “generate or update reports, or warnings, as appropriate” (Hassett: col. 4, lines 43-47).

Assignee respectfully traverses the rejection. “A patent composed of several elements is not proved obvious merely by demonstrating that each element was, independently, known in the prior art. Although common sense directs caution as to a patent application claiming as innovation the combination of two known devices according to their established functions, it can be important to identify a reason that would have prompted a person of ordinary skill in the art to combine the elements as the new invention does.” *KSR Intern. Co. v. Teleflex Inc.*, 127 S.Ct. 1727, 82 USPQ2d 1385, 1389 (2007). If a first reference “did in fact teach away from [a second reference], then that finding alone can defeat [an] obviousness claim.” *Winner Int’l Royalty Corp. v. Wang*, 202 F.3d 1340, 53 USPQ2d 1580, 1589 (Fed. Cir. 2000).

“A factfinder should be aware, of course, of the distortion caused by hindsight bias and must be cautious of arguments reliant upon ex post reasoning. See *Graham*, 383 U.S., at 36, 86 S.Ct. 684 (warning against a ‘temptation to read into the prior art the teachings of the invention in issue’ and instructing courts to “ ‘guard against slipping into the use of hindsight’ ” (quoting *Monroe Auto Equipment Co. v. Heckethorn Mfg. & Supply Co.*, 332 F.2d 406, 412 (C.A.6 1964))).” *KSR*, 127 S.Ct. 1727. Further, it “is difficult but necessary that the decision maker forget what he or she has been taught . . . about the claimed invention and cast the mind back to the time the invention was made (often as here many years), to occupy the mind of one skilled in the art who is presented only with the references, and who is normally guided by the then-accepted wisdom in the art.” (MPEP § 2141.01, citing *W.L. Gore & Associates, Inc. v. Garlock, Inc.*, 723 F.2d 1540, 220 USPQ 303, 313 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 851 (1984)).

Mahany has been differentiated above and does not teach, show, or suggest a waste management system or provide motivation for a waste management system, and does not teach paying personnel for services associated with the waste removal, among other things. *Hassett* teaches a hazardous waste shipment system that provides monitoring and control to verify the location and condition of each shipment. (Abstract.) *Hassett* provides a method of electronically marking, identifying and managing hazardous cargo and vehicles to decrease the risk to the general public and cost effectively provide detailed information on hazardous cargo, status and route. (Col. 1, ll. 56-60.) “Such information would also enhance safety measures for emergency personnel called to handle an accidental rupture of a hazardous material container.” (*Id.* at 60-62.) *Hassett* can include sensors to detect the condition of the load and store the information to memory on the mobile unit and communicate to a driver or to an on-route base station as the container and mobile unit pass by. (Col. 2, ll. 46-54.)

Hassett is concerned with enhancing public safety for and during the transportation of hazardous waste. *Hassett* does not teach, show, or suggest or provide motivation for a system or method that, among other things, is adapted to process waste management data for tracking a location of a waste storage unit, billing a customer associated with a waste removal, and paying

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personnel for services associated with the waste removal, as required in claim 1. Likewise, *Hassett* does not provide a method that, among other things, uses a waste management electronic base system that tracks a location of a waste storage unit, bills a customer associated with a waste removal, and pays personnel for services associated with the waste removal.

Thus, *Hassett* does not make up the deficiency that is in *Mahany*. Moreover, the combination of *Mahany* and *Hassett* does not teach, show, or suggest or provide motivation for the claimed invention. It would not be obvious in light of *Mahany* and *Hassett* to combine the references and then further add the payroll and billing features not described or discussed in either reference. The Examiner is respectfully requested to withdraw the rejection of *Mahany* in view of *Hassett*.

17. **Claims 3, 4, 17 and 18** are rejected under 35 U.S.C. 103(a) as being unpatentable over **Mahany** in view of **Tsukamoto (US 2003/0014334 A1)**.

18. **With respect to claims 3 and 17:** Mahany teaches the limitations in the rejections above. However, Mahany does not teach the waste comprises industrial waste and the system is adapted to comply with a manifest associated with the industrial waste. Tsukamoto teaches the waste comprises industrial waste and the system is adapted to comply with a manifest associated with the industrial waste. (paragraph 23 – “items transferred as said manifest data 6 are data such as the type, quantity, weight, shape, type of packing, and the results of component analysis of the waste 1 and the locations, names and people in charge of the discharging company 8, the collection/transportation company 9, and the company 10 dealing with intermediate-treatment/final-disposal. In this mode, it is preferable that the manifest data 6 may be transferred to the data management unit 5 by the record-transfer means 4 with the signatures of people in charge by using personal digital assistants. Portable telephones capable of transferring text data, electronic notebooks having communication functions”)

Therefore, it would have been obvious to one of ordinary skill in the art at the time of the invention to combine to portable wireless system of Mahany with the electronic manifest of Tsukamoto because of the need for all parties to have access to data via access means such as the Internet. (Tsukamoto: paragraph 20).

The Assignee respectfully traverses the rejection. *Mahany* has been differentiated above and does not teach, show, or suggest a waste management system or provide motivation for a waste management system, and does not teach paying personnel for services associate with the waste removal, among other things. *Tsukamoto* teaches a system and method of communicating images and data on the state of waste disposal, generally through still and/or moving images of

the various steps of waste disposal, along with manifest data and transportation routes to determine whether waste is being reliably and safely disposed. (Para. 0006.) The manifest data can be transferred to a data management unit by record-transfer means with signatures of people in charge by using PDAs. (Para. 0023.) Manifest data can include the “type, quantity, weight, shape, type of packing, and the results of component analysis of the waste 1 and the locations, names, and people in charge of the discharging company 8, the collection/transportation company 9, and the company 10 dealing with intermediate-treatment/final disposal.” (*Id.*)

While *Tsukamoto* teaches transferring manifest data, *Tsukamoto* does not teach generating the manifest. *Tsukamoto* may efficiently transfer the data electronically *after* the manifest is generated, but has no teaching, suggestion, showing, or motivation *to generate the manifest*, as claimed in claim 17. Further, *Tsukamoto* does not even teach, show, or suggest that the system is adapted to *comply* with a manifest associated with the industrial waste, as claimed in claim 3. The Examiner is respectfully requested to withdraw the rejection.

19. **With respect to claim 4:** Mahany teaches the limitations in the rejections above. However, Mahany does not teach the base system generates a manifest based on information from a generator of waste obtained from the portable unit. Tsukamoto teaches the base system generates a manifest based on information from a generator of waste obtained from the portable unit. (paragraph 23 – “items transferred as said manifest data 6 are data such as the type, quantity, weight, shape, type of packing, and the results of component analysis of the waste 1 and the locations, names and people in charge of the discharging company 8, the collection/transportation company 9, and the company 10 dealing with intermediate-treatment/final-disposal. In this mode, it is preferable that the manifest data 6 may be transferred to the data management unit 5 by the record-transfer means 4 with the signatures of people in charge by using personal digital assistants. Portable telephones capable of transferring text data, electronic notebooks having communication functions”).

Therefore, it would have been obvious to one of ordinary skill in the art at the time of the invention to combine to portable wireless system of Mahany with the electronic manifest of Tsukamoto because of the need for all parties to have access to data via access means such as the Internet. (Tsukamoto: paragraph 20).

Assignee respectfully traverses the rejection. *Mahany* has been differentiated above and does not teach, show, or suggest a waste management system or provide motivation for a waste management system, and does not teach paying personnel for services associate with the waste removal, among other things. *Tsukamoto* teaches a system and method of communicating images and data on the state of waste disposal, generally through still and/or moving images of the various steps of waste disposal, along with manifest data and transportation routes to determine whether waste is being reliably and safely disposed. (Para. 0006.) The manifest data can be transferred to a data management unit by record-transfer means with signatures of people

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in charge by using PDAs. (Para. 0023.) Manifest data can include the “type, quantity, weight, shape, type of packing, and the results of component analysis of the waste 1 and the locations, names, and people in charge of the discharging company 8, the collection/transportation company 9, and the company 10 dealing with intermediate-treatment/final disposal.” (*Id.*)

While *Tsukamoto* teaches transferring manifest data, *Tsukamoto* does not teach generating the manifest. *Tsukamoto* may efficiently transfer the data electronically *after* the manifest is generated, but has not teaching, suggestion, showing, or motivation *to generate the manifest*, as claimed in claim 4. The Examiner is respectfully requested to withdraw the rejection.

20. **With respect to claim 18:** Mahany teaches the limitations in the rejections above. However, Mahany does not teach accepting an electronic manifest into the portable unit. Tsukamoto teaches accepting an electronic manifest into the portable unit. (paragraph 23 -- "items transferred as said manifest data 6 are data such as the type, quantity, weight, shape, type of packing, and the results of component analysis of the waste 1 and the locations, names and people in charge of the discharging company 8, the collection/transportation company 9, and the company 10 dealing with intermediate-treatment/final-disposal. In this mode, it is preferable that the manifest data 6 may be transferred to the data management unit 5 by the record-transfer means 4 with the signatures of people in charge by using personal digital assistants. Portable telephones capable of transferring text data, electronic notebooks having communication functions").

Therefore, it would have been obvious to one of ordinary skill in the art at the time of the invention to combine the portable wireless system of Mahany with the electronic manifest of Tsukamoto because of the need for all parties to have access to data via access means such as the Internet. (Tsukamoto: paragraph 20).

The Assignee respectfully traverses the rejection. *Mahany* has been differentiated above and does not teach, show, or suggest a waste management system or provide motivation for a waste management system, and does not teach paying personnel for services associated with the waste removal, among other things. *Tsukamoto* teaches a system and method of communicating images and data on the state of waste disposal, generally through still and/or moving images of the various steps of waste disposal, along with manifest data and transportation routes to determine whether waste is being reliably and safely disposed. (Para. 0006.) *Tsukamoto* does not make up the deficiency of *Mahany* so as to teach, show, suggest or provide the motivation

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for the claimed invention. The Examiner is respectfully requested to withdraw the rejection.

For at least these reasons, Assignee respectfully submits that the claims 1-23 are patentable over the disclosure and teaching of *Mahany*, alone, or in combination with *Hassett* and/or *Tsukamoto*. Reconsideration and withdrawal of this rejection is requested.

2. Conclusion

Claims 1-23 are currently pending in this application and are presented with the above remarks for the Examiner. Assignee submits that each claim presented herein is patentable. A timely notice of allowance is respectfully requested.

Assignee thanks the Examiner for her consideration and effort on this file. If there are any questions or if additional information is needed, the Examiner is invited to telephone or email the undersigned.

Respectfully submitted,

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